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Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

IRVING A. BACKMAN, an individual;
IRVING A. BACKMAN & ASSOCIATES,
LLC, a Massachusetts limited liability
company; and G&B ENERGY, INC., a
Massachusetts corporation.

Plaintiff,

vs.

CHRISTOPHER M. GOGGIN, an individual;
and C2 ENGINEERING SERVICES, INC., a
North Carolina corporation.

Defendants.

AND RELATED CLAIMS

Case No: 2:16-cv-01108-JCM-PAL

**STIPULATION AND ORDER TO
CONTINUE JOINT PRE-TRIAL ORDER
DEADLINE AND RELATED
DEADLINES**

(First Request)

Pursuant to LR 26-4 and LR 1A 6-1, plaintiffs Irving A. Backman, Irving A. Backman & Associates, LLC, and G&B Energy, Inc. (“Plaintiffs”) and defendants Christopher M. Goggin and C2 Engineering Services, Inc. (“Defendants”), hereby stipulate as follows:

WHEREAS, pursuant to the Order Approving Stipulation to Continue Discovery Deadlines [Docket No. 85] and Minute Order [Docket No. 126], all discovery deadlines, as amended and extended, have now passed;

WHEREAS, on or around August 12, 2018, plaintiff Irving A. Backman, a 93-year old man residing in Dedham, Massachusetts, had a stroke;

WHEREAS, on September 11, 2018, the Court entered a Sealed Order granting in part and denying in part Plaintiffs’ Motion for Summary Judgment and said order restarted the time for the filing of a Joint Pretrial Order;

WHEREAS, on September 25, 2018, Plaintiffs’ counsel was first able to speak with Mr. Backman regarding the Sealed Order and the next steps in this case;

WHEREAS, the deadline for the Parties to file a Joint Pretrial Order is in less than twenty-one days on October 11, 2018 and would have been less than twenty-one days prior to when Plaintiffs’ counsel was first able to speak with Mr. Backman;

WHEREAS, the Parties agree that Mr. Backman should have some additional time to recover from his stroke and to return to good health;

WHEREAS, the Parties desire to continue with settlement negotiations in hopes of reaching a resolution and avoiding trial on the outstanding issues remaining following entry of this Court’s Sealed Order on Plaintiffs’ Motion for Summary Judgment;

WHEREAS, the Parties agree that a four-month continuance is in their best interest to conserve time and expenses, and to avoid unnecessary work in preparing for trial and therefore good cause exists to stay these proceedings for the reasons stated herein;

WHEREAS, the Parties desire a four-month continuance of the October 11, 2018 joint pre-trial order deadline, until **Friday, February 8, 2019**;

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of McDonald Carano LLP, and that on the 3rd day of October, 2018, I served a true and correct copy of the: **JOINT STIPULATION TO CONTINUE JOINT PRE-TRIAL ORDER DEADLINE AND RELATED DEADLINES** via the United States District Court's CM/ECF system as follows:

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*Attorneys for Defendants
Christopher M. Goggin and C2
Engineering Services, Inc.*

/s/ Angela Shoults
An employee of McDonald Carano LLP

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